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Before the
Federal Communications Commission
Washington, DC 20554

FILED/ACCEPTED

JUL 30 2007

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Section 73.202(b),) MB Docket No. 07-1
Table of Allotments,) RM-11356
FM Broadcast Stations.)
(Hemet, California))

To: Office of the Secretary
Attn: Chief, Audio Division, Media Bureau

COMMENTS

Southern California Public Radio ("SCPR"), by its attorneys, hereby submits these comments in support of the rulemaking referenced above ("NPRM") to amend the Commission's Table of FM Allotments to reserve Channel 273A at Hemet, California, for noncommercial educational ("NCE") use.

SCPR hereby incorporates by reference its Petition for Rulemaking in this proceeding.¹ If the Commission reserves Channel 273A at Hemet for noncommercial educational use, SCPR intends to submit an application for authority to construct and operate the new station. If SCPR's application is successful, SCPR intends promptly to construct the facility.

SCPR also supports the proposal to permit the use of actual terrain data pursuant to Section 73.313 of the Commission's Rules to calculate first and second NCE services. As noted in the NPRM, the use of actual terrain data would further the Commission's goal of promoting NCE service to underserved areas.² Indeed, using the standard methodology for predicting

¹ Petition for Rulemaking of Southern California Public Radio, reinstated in *Hemet, California*, Order, 21 FCC Rcd 10037 (M.B. 2006).

² See *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Report and Order, 15 FCC Rcd 7386 (2000).

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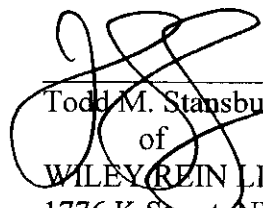
coverage, which assumes uniform terrain, the Commission initially found that an NCE allotment at Hemet would provide a first and/or second NCE service to only 2.5 percent of the 132,362 people within the proposed station's 60 dBu contour.³ In contrast, by using actual terrain methodology – a more reliable and accurate measure of service – the Hemet allotment would provide a first and/or second service to 40,880 people, which is 30.9% of the total population. As this example shows, the uniform terrain analysis substantially underestimates the number of people who would benefit from a first and/or second NCE service. Thus, the use of actual terrain data would promote the public interest by expanding NCE service to areas with the greatest need.

Accordingly, the Commission should amend the Table of FM Allotments to reserve Channel 273A at Hemet, California for noncommercial educational use.

Respectfully submitted,

SOUTHERN CALIFORNIA PUBLIC RADIO

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³ NPRM at ¶ 2.